

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

COLUMBIA GAS TRANSMISSION
CORPORATION,

Plaintiff,

v.

AN EASEMENT TO CONSTRUCT,
OPERATE AND MAINTAIN A 24-INCH
GAS TRANSMISSION PIPELINE ACROSS
PROPERTIES IN CHESTER COUNTY,
PENNSYLVANIA, OWNED BY JAY PAR
AND PAR ANBIL, et al. and UNKNOWN
PERSONS AND INTERESTED PARTIES,

Defendants.

C.A. No. 02-CV-3733

**PLAINTIFF COLUMBIA GAS TRANSMISSION
CORPORATION'S INITIAL DISCLOSURE UNDER FED.R.CIV.P. 26(a)(1)**

The plaintiff, Columbia Gas Transmission Corporation ("Columbia"), makes the following initial disclosures as required under Fed.R.Civ.P. 26(a)(1):

A. INDIVIDUALS WITH DISCOVERABLE INFORMATION

The following individuals may have discoverable information relevant to this matter:

Acquisition and Use of Properties at Issue

Richard J. and Victoria S. Channell

Edmund and Crista Ford

Joseph K. and Lisa J. Gallick

Michael and Joan Kelly

Jeffrey L. and Carolyn A. Pizagno March

Stuart P. and Deborah W. Sullivan

Sean T. and Margaret F. Sweeney

Lee R. and Martha M. Williams

John Alexander Churchman

Archbishop of Philadelphia

Frank J. and Linda B. Reddon

Frank T. and Anna K. Marino

Steven J. and Joanne S. McNaughton

Harold M. and Roberta E. Harper

Francisco T. and Kathleen D. Rivas

Robert L.M. and Linda Landenberg

Sudhir K. and Asha Bhatnagar

Herbert J. and Helen M. McCorry

Douglas B. and Donna G. Prichard

Acquisition of Right-of-Way Agreements and Easements

Douglas Richards
Scott McChesney
Bob Schini
Greg Calhoun
Columbia Gas Transmission Corporation
525 Highlands Boulevard
Suite 100
Coatesville, PA 19320

Joanne Eells
Columbia Gas Transmission Corporation
34646 Old Valley Pike
Strasburg, VA 22657

FERC Applications and Process

Mike Walker
Columbia Gas Transmission Corporation
1700 MacCorkle Avenue, SE
Charleston, WV 25314

Operation and Maintenance of Pipelines (Line 1896)

Andy Lake
Columbia Gas Transmission Corporation
293 Court Street
Binghamton, NY 13901

Mike Roberts
Columbia Gas Transmission Corporation
310 Fellowship Road, Rt. 2
Chester Springs, PA 19425

Expansion Project/Contract Issues/Market Demands

Bruce Ruhlin
Columbia Gas Transmission Corporation
1700 MacCorkle Avenue, SE
Charleston, WV 25314

Construction

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Scott Collier
Columbia Gas Transmission Corporation
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Charleston, WV 25314

Jon Crites
Columbia Gas Transmission Corporation
525 Highlands Boulevard
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Coatesville, PA 19320

Other Columbia employees and agents may also have knowledge as to the properties at issue.

B. DESCRIPTION OF DISCOVERABLE DOCUMENTS

At its Coatesville, Pennsylvania office, Columbia has copies of the relevant title documents, all of which are available to the public. Columbia also has photographs of the properties and certain internal documents related to negotiations with the affected landowners, as well as drawings and plans related to the replacement of the segment of Line 1896.

At its Charleston, West Virginia office, Columbia has documents relevant to its construction plans, the project and FERC applications related to the project.

C. DAMAGES

In this federal condemnation action, the landowner/defendants have the burden of proving their just compensation claims. If Columbia obtains appraisals of the property interest at stake, it will provide copies of those appraisals to the defendants.

D. INSURANCE

N/A.

REED SMITH LLP

Date: _____

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Columbia Gas Transmission Corporation

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing has been served by first-class mail, postage prepaid, upon the following:

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